



Jeff Fogel <jeff.fogel@gmail.com>

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## written response for Darrell Byers, Johnson v. Holmes

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Jeff Fogel <jeff.fogel@gmail.com>

Mon, Aug 3, 2020 at 9:55 AM

To: Amanda Farley <afarley@albemarle.org>

Cc: Jim Guynn <JimG@guynnwaddell.com>, Darrell Byers <byersd@albemarle.org>

Amanda,

To conclude (I hope), Captain Byers has identified #4 in Plaintiff's First Request for Production of Documents as the source of his request to Ms. Zawitz to prepare the chart marked as Exhibit 1 (chart of Holmes) at his deposition. He has also identified #2 in Plaintiff's Second Request for Production of Documents as the source for his request for the preparation of the chart that was marked as Exhibit 2 (Citation by Specified Officer). Captain Byers does not have the email that was sent to him on May 18, 2017 from Ms. Zawitz as marked as Exhibit 3 at his deposition. Please confirm that this is accurate.

Jeff Fogel

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Jeff Fogel <jeff.fogel@gmail.com>

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## written response for Darrell Byers, Johnson v. Holmes

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**Darrell Byers** <byersd@albemarle.org>

Wed, Aug 5, 2020 at 8:54 AM

To: Amanda Farley <afarley@albemarle.org>, Jeff Fogel <jeff.fogel@gmail.com>

Cc: Jim Guynn <JimG@guynnwaddell.com>

I affirm.

[Quoted text hidden]